

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> (1944-2013) MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
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VIA ECF AND FACSIMILE

April 22, 2016

The Honorable Frank Maas
United States District Court for the S.D.N.Y.
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 740
New York, NY 10007-1312

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

In accordance with Your Honor's directions on the record at the March 22, 2016 hearing, plaintiffs are providing Your Honor with items for consideration of plaintiffs' "particularized showing" that disclosure of the original source of documents produced to plaintiffs' counsel would place that source at risk of bodily injury, including death. Consistent with Your Honor's direction during that hearing, Plaintiffs request Your Honor's permission to have the documents filed with the Court "under seal" with copies served on Eric Lewis, Esq., at Lewis Baach PLLC, who have litigated the issue for defendants MWL/IIRO for "Attorneys' Eyes Only" review.

Respectfully,

Robert T. Haefele
ROBERT T. HAEFELE
PLAINTIFFS' EXECUTIVE COMMITTEES

cc: The Honorable George B. Daniels (via Facsimile)
Eric Lewis, Esq. (via electronic mail)
All Counsel of Record (Via ECF)